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May 21, 2007

VIA ELECTRONIC TRANSMISSION

Clerk of the Arizona Supreme Court  
1501 W. Washington, Suite 402  
Phoenix, AZ 85007

Please accept this comment letter on behalf of the Association of Corporate Counsel (ACC) and our members doing business in or located in Arizona. ACC represents the interests of over 21,000 members in the United States and 71 countries, including 188 in-house counsel members in our Arizona Chapter.

ACC supports the Petition to adopt an admission on motion rule in Arizona. However, ACC specifically endorses the Model Rule on Admission by Motion that was adopted by the American Bar Association's, Commission On Multijurisdictional Practice (attached).

Our legal system, like the national (and international) economy, has undergone rapid and profound change in recent years. In particular, the practice of law has been largely transformed in the last few decades. The increased multijurisdictional nature of today's legal practitioners can be attributed to a number of factors. Clients large and small, from every industry, increasingly are involved in disputes or transactions that cross state lines and require multi-state legal services. As law practice has become more specialized, corporate clients increasingly depend on lawyers who have expertise in a particular substantive area of law as it is applied across jurisdictional lines; clients look to hire lawyers who can meet their needs wherever legal representation is required. While local counsel will always play a vital role, there is an increasingly great need for national and even international counsel. This has been facilitated by a growing degree of uniformity in state law in a host of areas. The greater mobility of lawyers and the prominence of large multi-state and even international law firms has played an important role in this development. Retaking the bar exam shouldn't be a necessary evil for an in-house practitioner who's been transferred to different corporate offices or for a firm attorney who's been switched to a new locale.

Arizona's 2004 adoption of Ethics Rule 5.5 shows that the Arizona Bar and courts are cognizant of the increased multijurisdictional reality of modern legal practitioners. Arizona has already taken steps to update its local license and admission provisions to accommodate MJP changes and has done so without wavering on its responsibility to protect legal consumers. We commend attorneys in Arizona for now turning their attention to adoption of a balanced admission on motion rule as an important next step in the state's MJP progress.

Many jurisdictions have admission on motion rules that are tied to reciprocity agreements with the jurisdiction from which the attorney comes. While it's true that a reciprocity rule is better than no rule at all, they make little sense once the state has rightly accepted the principle that attorneys from other jurisdictions who move to the state and can prove their good standing and experience through the admission process shouldn't be limited based on state reciprocity standards – either lawyers are

or are not competent to practice in Arizona. A lawyer who happens to come from a state without such an agreement is harmed without any fault by such an exclusionary system. We strongly encourage the adoption of the ABA's Model Rule on Admission on Motion that was crafted to meet the needs of attorneys, state licensing officials, and legal consumers.

Arizona has already taken steps to amend its practice rules to begin to address the changed needs of modern legal practitioners and the true concerns of clients you seek to protect in your state. The adoption of an admission on motion rule is a common sense extension of addressing these changing needs.

Sincerely,

A handwritten signature in black ink that reads "Susan Hackett". The script is fluid and cursive, with the first name "Susan" and last name "Hackett" clearly distinguishable.

Susan Hackett  
Senior Vice President and General Counsel  
Association of Corporate Counsel

Mark N. Rogers  
ACC Arizona Chapter President  
Vice President, Corporate Counsel  
Insight Enterprises, Inc.